

Robert C. Taylor
Office of Contract Assistance
Office of Government Contracting
U.S. Small Business Administration
409 3rd St., SW
Washington, D.C. 20416

RE: 3245-AF40 - Proposed Rule, 13 CFR Parts 121, 125, 127 and 134 - RIN 3245-4F40
[Women-Owned Small Business Federal Contract Assistance Procedures, 72 Fed. Reg.
73,295 (Dec. 27, 2007)]

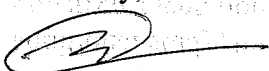
Dear Mr. Taylor:

I oppose a change in the Small Business Administration's Women's Procurement Program that would limit women-owned businesses' eligibility to only four relatively narrow industry sectors and to further limit the contract amounts to no more than \$5 million for manufacturing and \$3 million for other areas. There is no evidence to support SBA's assertion that only those industries (intelligence; engraving and metalworking; furniture and kitchen cabinet manufacturing; and motor vehicle dealers) are underrepresented in women-owned businesses.. Instead, the agency's determination of underrepresented industries should be based upon National Research Council findings that 87 percent of business and industry is not adequately represented with women-owned businesses. An additional study, by RAND Corp., came to the same conclusion about widespread underrepresentation. Clearly, the SBA is attempting to substantiate its case for the rule change on a set of false assertions.

Further, businesses in the SBA's four named industry sectors have not been attributed small business size standards, thus making them ineligible for the Women's Procurement Program. The cruel result is that no industry will be eligible for the Women's Procurement Program - unless governmental agencies undertake special studies to determine whether there has been government discrimination. The likelihood of such future study initiatives is low.

This rule change is unnecessary and flies against what federal statutes require of the agency. The proposed alteration is wholly contrary to Congress' intention that more federal contracts -- not fewer-- be awarded to qualified women-owned businesses across a broad spectrum of industries. Discouraging discrimination against women-owned businesses is in the fundamental interest of the federal government, as well as enhancing equal opportunities for women business owners and preventing their annual loss of millions of dollars. I urge you to withdraw this unfortunate and damaging regulatory change.

Sincerely,



Betty Carlisle
828 Valley Dr
Syracuse, NY 13207